UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

STRYKER CORPORATION and

HOWMEDICA OSTEONICS CORP,

Civil Action No.: 1:17-CV-00066

Plaintiffs,

HON. PAUL L. MALONEY

VS.

XL INSURANCE AM., INC v. fna WINTERTHUR INTERNATIONAL AM. INSURANCE CO.,

Defendant.

NON-PARTY TIG'S MOTION FOR PROTECTIVE ORDER

Non-party, TIG Insurance Company ("TIG"), by its counsel, Bos & Glazier, P.L.C., moves this Court for a Protective Order, pursuant to FRCP 26(c). Defendant XL has subpoenaed six attorneys who were retained by TIG in litigation that pre-dates this action and that was resolved in TIG's favor. TIG requests the Court to enter the Order attached to this motion to protect TIG from the undue burden and expense of preparing and presenting witnesses whose relevant knowledge was previously disclosed in declarations and document productions. TIG's motion is supported by the brief and exhibits enclosed with this motion.

WHEREFORE, TIG respectfully requests this Court to grant its motion for a protective order.

Respectfully submitted,

Dated: August 9, 2019 By: /s Carole D. Bos

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